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Corporation; Polo Retail, LLC; Polo Ralph Lauren
11 Corporation, doing business in California as Polo
Retail Corporation; and Fashions Outlet of
12 America, Inc.

13
14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
15 FOR THE COUNTY OF SAN FRANCISCO
16

17 ANN OTSUKA, an individual; JANIS
KEEFE, an individual; CORINNE PHIPPS,
18 an individual; and JUSTIN KISER, an
individual; and on behalf of all other similarly
situated,

20 Plaintiff(s),
v.

21 POLO RALPH LAUREN CORPORATION,
a Delaware Corporation; POLO RETAIL,
22 LLC, a Delaware Corporation; POLO
RALPH LAUREN CORPORATION, a
Delaware Corporation, doing business in
23 California as POLO RETAIL CORP;
FASHIONS OUTLET OF AMERICA, INC.,
24 a Delaware Corporation and DOES 1-500,
inclusive,

26 Defendants(s).
27

Case No. CGC-06-452655

DEFENDANTS POLO RALPH LAUREN
CORPORATION'S, POLO RETAIL, LLC.,
POLO RALPH LAUREN CORP. DBA POLO
RETAIL CORP.'S AND FASHIONS OUTLET
OF AMERICA, INC.'S RESPONSES TO
PLAINTIFFS' SPECIAL
INTERROGATORIES, SET ONE

28 Date Action Filed: May 30, 2006

1 PROPOUNDING PARTY: PLAINTIFFS OTSUKA, KEEFE, PHIPPS AND KISER

2 RESPONDING PARTY: POLO RALPH LAUREN CORPORATION, POLO RETAIL,
3 LLC., POLO RALPH LAUREN CORP. DBA POLO RETAIL
CORP. AND FASHIONS OUTLET OF AMERICA, INC.

4 SET NO: ONE (1)

5 Pursuant to Section 2030 of the Code of Civil Procedure, Defendants POLO RALPH
6 LAUREN CORPORATION (“Defendants”) respond and object to Plaintiffs ANN OTSUKA, JANIS
7 KEEFE, CORINNE PHIPPS, and JUSTIN KISER’s (“Plaintiffs”) Special Interrogatories, Set One,
8 as follows:

9 **PRELIMINARY STATEMENT**

10 The requests to and responses from Defendant Fashions Outlet, Inc. are identical as the other
11 Defendants. Even though Plaintiffs’ requests were numbered differently, Fashions Outlet’s responses
12 are included herein in response to all those requests.

13 These responses and objections to the Special Interrogatories are made solely for the purpose
14 of this action. It should be noted that Defendants have not fully completed its investigation of the
15 facts relating to this case, have not fully completed discovery and has not fully completed preparation
16 for trial. Therefore, the answers contained herein are based only on such information and documents
17 as are presently available to and specifically known to Defendants. It is anticipated that further
18 discovery, independent investigation, legal research and analysis will lead to the discovery of
19 additional non-privileged responsive documents, all of which may lead to substantial additions to,
20 changes in, and variations from the documents and/or information herein set forth.

21 The following responses to the Special Interrogatories are given without prejudice to
22 Defendants’ right to produce evidence of any subsequently discovered documents or facts which it
23 may later discover. Defendants accordingly reserve the right to produce additional information and
24 documents as additional facts are ascertained, analysis made and legal research completed, including
25 the discovery of additional responsive information and documents. The following answers are made
26 in a good faith effort to provide information which has been inquired about and is presently known.

GENERAL OBJECTIONS

1. Defendants make the following objections to each Interrogatory set forth in the Special Interrogatories. These objections shall be deemed incorporated into Defendants' responses to each individual Interrogatory set forth in the Special Interrogatories. Further objections may be specifically referred to in response to certain of the interrogatories for purposes of clarity or emphasis, but by doing so, Defendants are not waiving any of the general objections.

1. Defendants object to each interrogatory set forth in the Special Interrogatories to the extent that they request information or the identification of documents protected by any privilege, including without limit, the attorney-client privilege, the attorney work product doctrine, or any other applicable privilege or exemption from discovery. Nothing contained in this response is intended to be or should be considered as a waiver of the attorney-client privilege and/or the attorney work product doctrine, or any other applicable privilege or the right of privacy, trade secret or confidential information or documents, and to the extent that any request may be construed as calling for information or the identification of documents or information protected by such privilege or doctrine, a continuing objection to each and every such request is hereby imposed.

2. Defendants object to each interrogatory set forth in the Special Interrogatories to the extent that they request information or the identification of documents relating to (a) any ongoing investigations by any regulatory and/or government agency or entity, and/or (b) any other pending litigation, including but not limited to any settlement discussions or negotiations of any kind relating to such investigations and/or litigation, on the grounds that they are privileged and protected from disclosure, including but not limited to California Evidence Code Sections 1152 and 1154. To the extent that any interrogatory may be construed as calling for such information or the identification of documents, a continuing objection to each and every such request is hereby imposed.

3. Defendants object to each interrogatory set forth in the Special Interrogatories to the extent that they seek information or the identification of documents that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Defendants is performing a reasonable inquiry and search for information and documents as required by the California Code of Civil Procedure. At this stage, it is possible that even those

1 interrogatories that appear reasonable in scope on their face may, in fact, call for information or the
2 identification of documents that are not relevant nor reasonably calculated to lead to the discovery of
3 admissible evidence, and Defendants preserve their objections to each request to the extent that it
4 calls for the identification of such documents.

5 4. Nothing in these responses should be construed as an admission by Defendants
6 regarding the admissibility or relevance of any document or fact contained in Special Interrogatories.

7 5. Defendants object to each interrogatory set forth in the Special Interrogatory to the
8 extent that they contain undefined terms that are subject to multiple interpretations and are therefore
9 vague and ambiguous.

10 6. To the extent the Interrogatories require further organization, collation, research or
11 calculation, Defendants object thereto on the grounds of burden, oppression and harassment, and
12 instead elects, pursuant to California Code of Civil Procedure §§ 2030.210 and 2023.230, to produce
13 the documents from which such information may be derived.

14 7. Defendants object to any request to identify documents or witnesses set forth in the
15 Special Interrogatories to the extent that it calls for "any and all" documents or witnesses as being
16 overbroad and unduly burdensome. It is impossible to represent, even after a reasonably diligent
17 search, that all documents or things or witnesses falling within a request for identification can be or
18 have been located. Documents may be kept in a myriad of locations and files. Many people may
19 have handled them, they may be moved frequently, and they may have been arranged, rearranged or
20 reordered. Documents may have been lost or may have been part of materials disposed of in
21 accordance with a document retention program or otherwise. Therefore, Defendants cannot represent
22 that they have produced all documents or things of the type requested, only that it has produced those
23 that it could locate after a reasonably diligent search, given the time constraints available. In the event
24 that future responsive documents are located, Defendants reserve the right to identify such
25 documents, and/or to use such documents at trial or to identify additional witnesses and/or to call
26 such witnesses at trial.

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1 **RESPONSES TO SPECIAL INTERROGATORIES**

2 **SPECIAL INTERROGATORY NO. 1**

3 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
4 Rodeo Drive store in Beverly Hills, California, between May 30, 2002, and May 30, 2003. (For
5 purposes of these interrogatories, "YOU" and "YOUR" refers to Polo Ralph Lauren Corporation, its
6 employees, agents, officers, directors and any other person authorized to act on behalf of Polo Ralph
7 Lauren Corporation; and "SALES ASSOCIATES" means YOUR employees who sell products at any
8 of your stores, including full- and part-time sales associates and senior sales associates.)

9 **RESPONSE TO SPECIAL INTERROGATORY NO. 1**

10 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
11 burdensome and oppressive. Defendants further object to this request on the ground that this request
12 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
13 admissible evidence.

14 Subject to and without waiving these objections, Defendants respond as follows:

15 See information contained in chart for store #831, attached hereto as Exhibit A.

16 **SPECIAL INTERROGATORY NO. 2**

17 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
18 Rodeo Drive store in Beverly Hills, California, between May 30, 2003, and May 30, 2004.

19 **RESPONSE TO SPECIAL INTERROGATORY NO. 2**

20 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
21 burdensome and oppressive. Defendants further object to this request on the ground that this request
22 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
23 admissible evidence.

24 Subject to and without waiving these objections, Defendants respond as follows:

25 See information contained in chart for store #831, attached hereto as Exhibit A.

26 **SPECIAL INTERROGATORY NO. 3**

27 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
28 Rodeo Drive store in Beverly Hills, California, between May 30, 2004, and May 30, 2005.

1 RESPONSE TO SPECIAL INTERROGATORY NO. 3

2 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
3 burdensome and oppressive. Defendants further object to this request on the ground that this request
4 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
5 admissible evidence.

6 Subject to and without waiving these objections, Defendants respond as follows:

7 See information contained in chart for store #831, attached hereto as Exhibit A.

8 SPECIAL INTERROGATORY NO. 4

9 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
10 Rodeo Drive store in Beverly Hills, California, between May 30, 2005, and May 30, 2006.

11 RESPONSE TO SPECIAL INTERROGATORY NO. 4

12 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
13 burdensome and oppressive. Defendants further object to this request on the ground that this request
14 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
15 admissible evidence.

16 Subject to and without waiving these objections, Defendants respond as follows:

17 See information contained in chart for store #831, attached hereto as Exhibit A.

18 SPECIAL INTERROGATORY NO. 5

19 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
20 Rodeo Drive store in Beverly Hills, California, between May 30, 2006, and the present.

21 RESPONSE TO SPECIAL INTERROGATORY NO. 5

22 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
23 burdensome and oppressive. Defendants further object to this request on the ground that this request
24 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
25 admissible evidence.

26 Subject to and without waiving these objections, Defendants respond as follows:

27 See information contained in chart for store #831, attached hereto as Exhibit A.

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1 SPECIAL INTERROGATORY NO. 6

2 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
3 Burlingame Avenue store in. Burlingame, California, between May 30, 2002, and May 30, 2003.

4 RESPONSE TO SPECIAL INTERROGATORY NO. 6

5 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
6 burdensome and oppressive. Defendants further object to this request on the ground that this request
7 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
8 admissible evidence.

9 Subject to and without waiving these objections, Defendants respond as follows:

10 See information contained in chart for store #836, attached hereto as Exhibit A.

11 SPECIAL INTERROGATORY NO. 7

12 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
13 Burlingame Avenue store in. Burlingame, California, between May 30, 2003, and May 30, 2004.

14 RESPONSE TO SPECIAL INTERROGATORY NO. 7

15 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
16 burdensome and oppressive. Defendants further object to this request on the ground that this request
17 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
18 admissible evidence.

19 Subject to and without waiving these objections, Defendants respond as follows:

20 See information contained in chart for store #836, attached hereto as Exhibit A.

21 SPECIAL INTERROGATORY NO. 8

22 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
23 Burlingame Avenue store in Burlingame, California, between May 30, 2004, and May 30, 2005.

24 RESPONSE TO SPECIAL INTERROGATORY NO. 8

25 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
26 burdensome and oppressive. Defendants further object to this request on the ground that this request
27 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
28 admissible evidence.

1 Subject to and without waiving these objections, Defendants respond as follows:

2 See information contained in chart for store #836, attached hereto as Exhibit A.

3 **SPECIAL INTERROGATORY NO. 9**

4 State the number of SALES ASSOCIATES employed for any, amount of time in YOUR
5 Burlingame Avenue store in Burlingame, California, between May 30, 2005, and May 30, 2006.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 9**

7 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
8 burdensome and oppressive. Defendants further object to this request on the ground that this request
9 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
10 admissible evidence.

11 Subject to and without waiving these objections, Defendants respond as follows:

12 See information contained in chart for store #836, attached hereto as Exhibit A.

13 **SPECIAL INTERROGATORY NO. 10**

14 State the number of SALES ASSOCIATES employed for any amount of time in. YOUR
15 Burlingame Avenue store in Burlingame, California, between May 30, 2006, and the present.

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 10**

17 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
18 burdensome and oppressive. Defendants further object to this request on the ground that this request
19 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
20 admissible evidence.

21 Subject to and without waiving these objections, Defendants respond as follows:

22 See information contained in chart for store #836, attached hereto as Exhibit A.

23 **SPECIAL INTERROGATORY NO. 11**

24 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
25 South Coast Plaza store in Costa Mesa, California, between May 30, 2002, and May 30, 2003.

26 **RESPONSE TO SPECIAL INTERROGATORY NO. 11**

27 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
28 burdensome and oppressive. Defendants further object to this request on the ground that this request

1 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
2 admissible evidence.

3 Subject to and without waiving these objections, Defendants respond as follows:

4 See information contained in chart for store #873, attached hereto as Exhibit A.

5 SPECIAL INTERROGATORY NO. 12

6 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
7 South Coast Plaza store in Costa Mesa, California, between May 30, 2003, and May 30, 2004.

8 RESPONSE TO SPECIAL INTERROGATORY NO. 12

9 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
10 burdensome and oppressive. Defendants further object to this request on the ground that this request
11 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
12 admissible evidence.

13 Subject to and without waiving these objections, Defendants respond as follows:

14 See information contained in chart for store #873, attached hereto as Exhibit A.

15 SPECIAL INTERROGATORY NO. 13

16 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
17 South Coast Plaza store in Costa Mesa, California, between May 30, 2004, and May 30, 2005.

18 RESPONSE TO SPECIAL INTERROGATORY NO. 13

19 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
20 burdensome and oppressive. Defendants further object to this request on the ground that this request
21 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
22 admissible evidence.

23 Subject to and without waiving these objections, Defendants respond as follows:

24 See information contained in chart for store #873, attached hereto as Exhibit A.

25 SPECIAL INTERROGATORY NO. 14

26 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
27 South Coast Plaza store in Costa Mesa, California, between May 30, 2005, and May 30, 2006.

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1 RESPONSE TO SPECIAL INTERROGATORY NO. 14

2 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
3 burdensome and oppressive. Defendants further object to this request on the ground that this request
4 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
5 admissible evidence.

6 Subject to and without waiving these objections, Defendants respond as follows:

7 See information contained in chart for store #873, attached hereto as Exhibit A.

8 SPECIAL INTERROGATORY NO. 15

9 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
10 South Coast Plaza store in Costa Mesa, California, between May 30, 2006, and the present.

11 RESPONSE TO SPECIAL INTERROGATORY NO. 15

12 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
13 burdensome and oppressive. Defendants further object to this request on the ground that this request
14 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
15 admissible evidence.

16 Subject to and without waiving these objections, Defendants respond as follows:

17 See information contained in chart for store #873, attached hereto as Exhibit A.

18 SPECIAL INTERROGATORY NO. 16

19 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
20 Girard Avenue store in La Jolla, California, between May 30, 2002, and May 30, 2003.

21 RESPONSE TO SPECIAL INTERROGATORY NO. 16

22 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
23 burdensome and oppressive. Defendants further object to this request on the ground that this request
24 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
25 admissible evidence.

26 Subject to and without waiving these objections, Defendants respond as follows:

27 See information contained in chart for store #817, attached hereto as Exhibit A.

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1 SPECIAL INTERROGATORY NO. 17

2 State the number of SALES ASSOCIATES employed for any amount of time in. YOUR
3 Girard Avenue store in La Jolla, California, between May 30, 2003, and May 30, 2004.

4 RESPONSE TO SPECIAL INTERROGATORY NO. 17

5 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
6 burdensome and oppressive. Defendants further object to this request on the ground that this request
7 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
8 admissible evidence.

9 Subject to and without waiving these objections, Defendants respond as follows:

10 See information contained in chart for store #817, attached hereto as Exhibit A.

11 SPECIAL INTERROGATORY NO. 18

12 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
13 Girard Avenue store in La Jolla, California, between May 30, 2004, and May 30, 2005.

14 RESPONSE TO SPECIAL INTERROGATORY NO. 18

15 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
16 burdensome and oppressive. Defendants further object to this request on the ground that this request
17 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
18 admissible evidence.

19 Subject to and without waiving these objections, Defendants respond as follows:

20 See information contained in chart for store #817, attached hereto as Exhibit A.

21 SPECIAL INTERROGATORY NO. 19

22 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
23 Girard Avenue store in La Jolla, California, between May 30, 2005, and May 30, 2006.

24 RESPONSE TO SPECIAL INTERROGATORY NO. 19

25 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
26 burdensome and oppressive. Defendants further object to this request on the ground that this request
27 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
28 admissible evidence.

1 Subject to and without waiving these objections, Defendants respond as follows:

2 See information contained in chart for store #817, attached hereto as Exhibit A.

3 SPECIAL INTERROGATORY NO. 20

4 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
5 Girard Avenue store in La Jolla, California, between May 30, 2006, and the present.

6 RESPONSE TO SPECIAL INTERROGATORY NO. 20

7 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
8 burdensome and oppressive. Defendants further object to this request on the ground that this request
9 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
10 admissible evidence.

11 Subject to and without waiving these objections, Defendants respond as follows:

12 See information contained in chart for store #817, attached hereto as Exhibit A.

13 SPECIAL INTERROGATORY NO. 21

14 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
15 Ralph Lauren Stanford Shopping Center store in Palo Alto, California, between May 30, 2002, and
16 May 30, 2003.

17 RESPONSE TO SPECIAL INTERROGATORY NO. 21

18 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
19 burdensome and oppressive. Defendants further object to this request on the ground that this request
20 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
21 admissible evidence.

22 Subject to and without waiving these objections, Defendants respond as follows:

23 See information contained in chart for store #810, attached hereto as Exhibit A.

24 SPECIAL INTERROGATORY NO. 22

25 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
26 Ralph Lauren Stanford Shopping Center store in Palo Alto, California, between May 30, 2003, and
27 May 30, 2004.

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1 RESPONSE TO SPECIAL INTERROGATORY NO. 22

2 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
3 burdensome and oppressive. Defendants further object to this request on the ground that this request
4 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
5 admissible evidence.

6 Subject to and without waiving these objections, Defendants respond as follows:

7 See information contained in chart for store #810, attached hereto as Exhibit A.

8 SPECIAL INTERROGATORY NO. 23

9 State the number of SALES ASSOCIATES employed for any amount of time in YOU] Ralph
10 Lauren Stanford Shopping Center store in Palo Alto, California, between May 30, 2004, an May 30,
11 2005.

12 RESPONSE TO SPECIAL INTERROGATORY NO. 23

13 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
14 burdensome and oppressive. Defendants further object to this request on the ground that this request
15 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
16 admissible evidence.

17 Subject to and without waiving these objections, Defendants respond as follows:

18 See information contained in chart for store #810, attached hereto as Exhibit A.

19 SPECIAL INTERROGATORY NO. 24

20 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
21 Ralph Lauren Stanford Shopping Center store in Palo Alto, California, between May 30, 2005, and
22 May 30, 2006.

23 RESPONSE TO SPECIAL INTERROGATORY NO. 24

24 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
25 burdensome and oppressive. Defendants further object to this request on the ground that this request
26 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
27 admissible evidence.

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1 Subject to and without waiving these objections, Defendants respond as follows:

2 See information contained in chart for store #810, attached hereto as Exhibit A.

3 SPECIAL INTERROGATORY NO. 25

4 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
5 Ralph Lauren Stanford Shopping Center store in Palo Alto, California, between May 30, 2006, and
6 the present.

7 RESPONSE TO SPECIAL INTERROGATORY NO. 25

8 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
9 burdensome and oppressive. Defendants further object to this request on the ground that this request
10 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
11 admissible evidence.

12 Subject to and without waiving these objections, Defendants respond as follows:

13 See information contained in chart for store #810, attached hereto as Exhibit A.

14 SPECIAL INTERROGATORY NO. 26

15 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Cross
16 Creek Road store in Malibu, California, between May 30, 2002, and May 30, 2003.

17 RESPONSE TO SPECIAL INTERROGATORY NO. 26

18 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
19 burdensome, oppressive and calls for speculation. Defendants further object on the ground that the
20 interrogatory is premature in that it seeks information regarding a store that was not yet opened.
21 Defendants finally object to this request on the ground that this request seeks information that is not
22 relevant and is not reasonably calculated to lead to the discovery of admissible evidence.

23 Subject to and without waiving these objections, Defendants respond as follows:

24 There were no sales associates employed at this time because the store was not yet opened.

25 SPECIAL INTERROGATORY NO. 27

26 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Cross
27 Creek Road store in Malibu, California., between May 30, 2003, and May 30, 2004.

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1 RESPONSE TO SPECIAL INTERROGATORY NO. 27

2 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
3 burdensome, oppressive and calls for speculation. Defendants further object on the ground that the
4 interrogatory is premature in that it seeks information regarding a store that was not yet opened.
5 Defendants finally object to this request on the ground that this request seeks information that is not
6 relevant and is not reasonably calculated to lead to the discovery of admissible evidence.

7 Subject to and without waiving these objections, Defendants respond as follows:

8 There were no sales associates employed at this time because the store was not yet opened.

9 SPECIAL INTERROGATORY NO. 28

10 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Cross
11 Creek Road store in Malibu, California, between May 30, 2004, and May 30, 2005.

12 RESPONSE TO SPECIAL INTERROGATORY NO. 28

13 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
14 burdensome, oppressive and calls for speculation. Defendants further object on the ground that the
15 interrogatory is premature in that it seeks information regarding a store that was not yet opened.
16 Defendants finally object to this request on the ground that this request seeks information that is not
17 relevant and is not reasonably calculated to lead to the discovery of admissible evidence.

18 Subject to and without waiving these objections, Defendants respond as follows:

19 There were no sales associates employed at this time because the store was not yet opened.

20 SPECIAL INTERROGATORY NO. 29

21 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Cross
22 Creek Road store in Malibu, California, between May 30, 2005, and May 30, 2006.

23 RESPONSE TO SPECIAL INTERROGATORY NO. 29

24 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
25 burdensome, oppressive and calls for speculation. Defendants further object on the ground that the
26 interrogatory is premature in that it seeks information regarding a store that was not yet opened.
27 Defendants finally object to this request on the ground that this request seeks information that is not
28 relevant and is not reasonably calculated to lead to the discovery of admissible evidence.

1 Subject to and without waiving these objections, Defendants respond as follows:

2 There were no sales associates employed at this time because the store was not yet opened.

3 SPECIAL INTERROGATORY NO. 30

4 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Cross
5 Creek Road store in Malibu, California, between May 30, 2006, and the present.

6 RESPONSE TO SPECIAL INTERROGATORY NO. 30

7 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
8 burdensome, oppressive and calls for speculation. Defendants further object on the ground that the
9 interrogatory is premature in that it seeks information regarding a store that was not yet opened
10 during part of the time period of the request. Defendants finally object to this request on the ground
11 that this request seeks information that is not relevant and is not reasonably calculated to lead to the
12 discovery of admissible evidence.

13 Subject to and without waiving these objections, Defendants respond as follows:

14 See information contained in chart for stores #844 and #847, attached hereto as Exhibit A.

15 SPECIAL INTERROGATORY NO. 31

16 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
17 Rugby store in the Stanford Shopping Center in Palo Alto, California, between May 30, 2002, and
18 May 30, 2003.

19 RESPONSE TO SPECIAL INTERROGATORY NO. 31

20 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
21 burdensome, oppressive and calls for speculation. Defendants further object on the ground that the
22 interrogatory is premature in that it seeks information regarding a store that was not yet opened.
23 Defendants finally object to this request on the ground that this request seeks information that is not
24 relevant and is not reasonably calculated to lead to the discovery of admissible evidence.

25 Subject to and without waiving these objections, Defendants respond as follows:

26 There were no sales associates employed at this time because the store was not yet opened.

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1 SPECIAL INTERROGATORY NO. 32

2 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
3 Rugby store in the Stanford Shopping Center in Palo Alto, California, between May 30, 2003, and
4 May 30, 2004.

5 RESPONSE TO SPECIAL INTERROGATORY NO. 32

6 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
7 burdensome, oppressive and calls for speculation. Defendants further object on the ground that the
8 interrogatory is premature in that it seeks information regarding a store that was not yet opened.
9 Defendants finally object to this request on the ground that this request seeks information that is not
10 relevant and is not reasonably calculated to lead to the discovery of admissible evidence.

11 Subject to and without waiving these objections, Defendants respond as follows:

12 There were no sales associates employed at this time because the store was not yet opened.

13 SPECIAL INTERROGATORY NO. 33

14 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
15 Rugby store in the Stanford Shopping Center in Palo Alto, California, between May 30, 2004, and
16 May 30, 2005.

17 RESPONSE TO SPECIAL INTERROGATORY NO. 33

18 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
19 burdensome, oppressive and calls for speculation. Defendants further object on the ground that the
20 interrogatory is premature in that it seeks information regarding a store that was not yet opened.
21 Defendants finally object to this request on the ground that this request seeks information that is not
22 relevant and is not reasonably calculated to lead to the discovery of admissible evidence.

23 Subject to and without waiving these objections, Defendants respond as follows:

24 There were no sales associates employed at this time because the store was not yet opened.

25 SPECIAL INTERROGATORY NO. 34

26 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
27 Rugby store in the Stanford Shopping Center in Palo Alto, California, between May 30, 2005, and
28 May 30, 2006.

1 RESPONSE TO SPECIAL INTERROGATORY NO. 34

2 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
 3 burdensome, oppressive and calls for speculation. Defendants further object on the ground that the
 4 interrogatory is premature in that it seeks information regarding a store that was not yet opened
 5 during part of the time period of the request. Defendants finally object to this request on the ground
 6 that this request seeks information that is not relevant and is not reasonably calculated to lead to the
 7 discovery of admissible evidence.

8 Subject to and without waiving these objections, Defendants respond as follows:

9 There were no sales associates employed at this time because the store was not yet opened.

10 SPECIAL INTERROGATORY NO. 35

11 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
 12 Rugby store in the Stanford Shopping Center in Palo Alto, California, between May 30, 2006, and the
 13 present.

14 RESPONSE TO SPECIAL INTERROGATORY NO. 35

15 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
 16 burdensome, oppressive and calls for speculation. Defendants further object on the ground that the
 17 interrogatory is premature in that it seeks information regarding a store that was not yet opened
 18 during part of the time period of the request. Defendants finally object to this request on the ground
 19 that this request seeks information that is not relevant and is not reasonably calculated to lead to the
 20 discovery of admissible evidence.

21 Subject to and without waiving these objections, Defendants respond as follows:

22 See information contained in chart for store #409, attached hereto as Exhibit A.

23 SPECIAL INTERROGATORY NO. 36

24 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
 25 Pavilions Lane store in Sacramento, California, between May 30, 2002, and May 30, 2003.

26 RESPONSE TO SPECIAL INTERROGATORY NO. 36

27 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
 28 burdensome, oppressive and calls for speculation. Defendants further object on the ground that the

1 interrogatory seeks information not in their possession or control. Defendants finally object to this
2 request on the ground that this request seeks information that is not relevant and is not reasonably
3 calculated to lead to the discovery of admissible evidence.

4 Subject to and without waiving these objections, Defendants respond as follows:

5 The Sacramento store is owned by a licensee of Defendants and as a result, Defendants have
6 no knowledge or information to be able to respond to this request.

7 SPECIAL INTERROGATORY NO. 37

8 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
9 Pavilions Lane store in Sacramento, California, between May 30, 2003, and May 30, 2004.

10 RESPONSE TO SPECIAL INTERROGATORY NO. 37

11 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
12 burdensome, oppressive and calls for speculation. Defendants further object on the ground that the
13 interrogatory seeks information not in their possession or control. Defendants finally object to this
14 request on the ground that this request seeks information that is not relevant and is not reasonably
15 calculated to lead to the discovery of admissible evidence.

16 Subject to and without waiving these objections, Defendants respond as follows:

17 Defendants have no knowledge or information to be able to adequately respond to this
18 request.

19 SPECIAL INTERROGATORY NO. 38

20 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
21 Pavilions Lane store in Sacramento, California, between May 30, 2004, and May 30, 2005.

22 RESPONSE TO SPECIAL INTERROGATORY NO. 38

23 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
24 burdensome, oppressive and calls for speculation. Defendants further object on the ground that the
25 interrogatory seeks information not in their possession or control. Defendants finally object to this
26 request on the ground that this request seeks information that is not relevant and is not reasonably
27 calculated to lead to the discovery of admissible evidence.

28 Subject to and without waiving these objections, Defendants respond as follows:

1 The Sacramento store is owned by a licensee of Defendants and as a result, Defendants have
2 no knowledge or information to be able to respond to this request.

3 SPECIAL INTERROGATORY NO. 39

4 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
5 Pavilions Lane store in Sacramento, California, between May 30, 2005, and May 30, 2006.

6 RESPONSE TO SPECIAL INTERROGATORY NO. 39

7 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
8 burdensome, oppressive and calls for speculation. Defendants further object on the ground that the
9 interrogatory seeks information not in their possession or control. Defendants finally object to this
10 request on the ground that this request seeks information that is not relevant and is not reasonably
11 calculated to lead to the discovery of admissible evidence.

12 Subject to and without waiving these objections, Defendants respond as follows:

13 The Sacramento store is owned by a licensee of Defendants and as a result, Defendants have
14 no knowledge or information to be able to respond to this request.

15 SPECIAL INTERROGATORY NO. 40

16 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
17 Pavilions Lane store in Sacramento, California, between May 30, 2006, and the present.

18 RESPONSE TO SPECIAL INTERROGATORY NO. 40

19 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
20 burdensome, oppressive and calls for speculation. Defendants further object on the ground that the
21 interrogatory seeks information not in their possession or control. Defendants finally object to this
22 request on the ground that this request seeks information that is not relevant and is not reasonably
23 calculated to lead to the discovery of admissible evidence.

24 Subject to and without waiving these objections, Defendants respond as follows:

25 The Sacramento store is owned by a licensee of Defendants and as a result, Defendants have
26 no knowledge or information to be able to respond to this request.

27 ///

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1 SPECIAL INTERROGATORY NO. 41

2 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Post
3 Street store in San Francisco, California, between May 30, 2002; and May 30, 2003.

4 RESPONSE TO SPECIAL INTERROGATORY NO. 41

5 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
6 burdensome and oppressive. Defendants further object to this request on the ground that this request
7 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
8 admissible evidence.

9 Subject to and without waiving these objections, Defendants respond as follows:

10 See information contained in chart for store #802, attached hereto as Exhibit A.

11 SPECIAL INTERROGATORY NO. 42

12 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Post
13 Street store in San Francisco, California, between May 30, 2003, and May 30, 2004.

14 RESPONSE TO SPECIAL INTERROGATORY NO. 42

15 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
16 burdensome and oppressive. Defendants further object to this request on the ground that this request
17 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
18 admissible evidence.

19 Subject to and without waiving these objections, Defendants respond as follows:

20 See information contained in chart for store #802, attached hereto as Exhibit A.

21 SPECIAL INTERROGATORY NO. 43

22 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Post
23 Street store in San. Francisco, California, between May 30, 2004, and May 30, 2005.

24 RESPONSE TO SPECIAL INTERROGATORY NO. 43

25 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
26 burdensome and oppressive. Defendants further object to this request on the ground that this request
27 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
28 admissible evidence.

1 Subject to and without waiving these objections, Defendants respond as follows:

2 See information contained in chart for store #802, attached hereto as Exhibit A.

3 SPECIAL INTERROGATORY NO. 44

4 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Post
5 Street store in San Francisco, California, between May 30, 2005, and May 30, 2006.

6 RESPONSE TO SPECIAL INTERROGATORY NO. 44

7 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
8 burdensome and oppressive. Defendants further object to this request on the ground that this request
9 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
10 admissible evidence.

11 Subject to and without waiving these objections, Defendants respond as follows:

12 See information contained in chart for store #802, attached hereto as Exhibit A.

13 SPECIAL INTERROGATORY NO. 45

14 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Post
15 Street store in San Francisco, California, between May 30, 2006, and the present.

16 RESPONSE TO SPECIAL INTERROGATORY NO. 45

17 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
18 burdensome and oppressive. Defendants further object to this request on the ground that this request
19 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
20 admissible evidence.

21 Subject to and without waiving these objections, Defendants respond as follows:

22 See information contained in chart for store #802, attached hereto as Exhibit A.

23 SPECIAL INTERROGATORY NO. 46

24 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
25 Ralph Lauren Factory Store in Alpine, California, between May 30, 2002, and May 30, 2003.

26 RESPONSE TO SPECIAL INTERROGATORY NO. 46

27 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
28 burdensome and oppressive. Defendants further object to this request on the ground that this request

1 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
2 admissible evidence.

3 Subject to and without waiving these objections, Defendants respond as follows:

4 See information contained in chart for store #802, attached hereto as Exhibit A.

5 SPECIAL INTERROGATORY NO. 47

6 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
7 Ralph Lauren Factory Store in Alpine, California, between May 30, 2003, and May 30, 2004.

8 RESPONSE TO SPECIAL INTERROGATORY NO. 47

9 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
10 burdensome and oppressive. Defendants further object to this request on the ground that this request
11 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
12 admissible evidence.

13 Subject to and without waiving these objections, Defendants respond as follows:

14 See information contained in chart for store #130, attached hereto as Exhibit A.

15 SPECIAL INTERROGATORY NO. 48

16 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
17 Ralph Lauren Factory Store in Alpine, California, between May 30, 2004, and May 30, 2005.

18 RESPONSE TO SPECIAL INTERROGATORY NO. 48

19 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
20 burdensome and oppressive. Defendants further object to this request on the ground that this request
21 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
22 admissible evidence.

23 Subject to and without waiving these objections, Defendants respond as follows:

24 See information contained in chart for store #130, attached hereto as Exhibit A.

25 SPECIAL. INTERROGATORY NO. 49

26 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
27 Ralph Lauren Factory Store in Alpine, California, between May 30, 2005, and May 30, 2006.

28 ///

1 RESPONSE TO SPECIAL INTERROGATORY NO. 49

2 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
3 burdensome and oppressive. Defendants further object to this request on the ground that this request
4 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
5 admissible evidence.

6 Subject to and without waiving these objections, Defendants respond as follows:

7 See information contained in chart for store #130, attached hereto as Exhibit A.

8 SPECIAL INTERROGATORY NO. 50

9 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
10 Ralph Lauren Factory Store in Alpine, California, between May 30, 2006, and the present.

11 RESPONSE TO SPECIAL INTERROGATORY NO. 50

12 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
13 burdensome and oppressive. Defendants further object to this request on the ground that this request
14 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
15 admissible evidence.

16 Subject to and without waiving these objections, Defendants respond as follows:

17 See information contained in chart for store #130, attached hereto as Exhibit A.

18 SPECIAL INTERROGATORY NO. 51

19 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
20 Ralph Lauren Factory Store in Anderson, California, between May 30, 2002, and May 30, 2003.

21 RESPONSE TO SPECIAL INTERROGATORY NO. 51

22 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
23 burdensome and oppressive. Defendants further object to this request on the ground that this request
24 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
25 admissible evidence.

26 Subject to and without waiving these objections, Defendants respond as follows:

27 See information contained in chart for store #37, attached hereto as Exhibit A.

28 ///

1 SPECIAL INTERROGATORY NO. 52

2 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
3 Ralph Lauren Factory Store in Anderson, California, between May 30, 2003, and May 30, 2004.

4 RESPONSE TO SPECIAL INTERROGATORY NO. 52

5 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
6 burdensome and oppressive. Defendants further object to this request on the ground that this request
7 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
8 admissible evidence.

9 Subject to and without waiving these objections, Defendants respond as follows:

10 See information contained in chart for store #37, attached hereto as Exhibit A.

11 SPECIAL INTERROGATORY NO. 53

12 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
13 Ralph Lauren Factory Store in Anderson, California, between May 30, 2004, and May 30, 2005.

14 RESPONSE TO SPECIAL INTERROGATORY NO. 53

15 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
16 burdensome and oppressive. Defendants further object to this request on the ground that this request
17 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
18 admissible evidence.

19 Subject to and without waiving these objections, Defendants respond as follows:

20 See information contained in chart for store #37, attached hereto as Exhibit A.

21 SPECIAL INTERROGATORY NO. 54

22 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
23 Ralph Lauren Factory Store in Anderson, California, between May 30, 2005, and May 30, 2006.

24 RESPONSE TO SPECIAL INTERROGATORY NO. 54

25 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
26 burdensome and oppressive. Defendants further object to this request on the ground that this request
27 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
28 admissible evidence.

1 Subject to and without waiving these objections, Defendants respond as follows:

2 See information contained in chart for store #37, attached hereto as Exhibit A.

3 SPECIAL INTERROGATORY NO. 55

4 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
5 Ralph Lauren Factory Store in Anderson, California, between May 30, 2006, and the present.

6 RESPONSE TO SPECIAL INTERROGATORY NO. 55

7 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
8 burdensome and oppressive. Defendants further object to this request on the ground that this request
9 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
10 admissible evidence.

11 Subject to and without waiving these objections, Defendants respond as follows:

12 See information contained in chart for store #37, attached hereto as Exhibit A.

13 SPECIAL INTERROGATORY NO. 56

14 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
15 Ralph Lauren Factory Store in Barstow, California, between May 30, 2002, and May 30, 2003.

16 RESPONSE TO SPECIAL INTERROGATORY NO. 56

17 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
18 burdensome and oppressive. Defendants further object to this request on the ground that this request
19 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
20 admissible evidence.

21 Subject to and without waiving these objections, Defendants respond as follows:

22 See information contained in chart for store #25, attached hereto as Exhibit A.

23 SPECIAL INTERROGATORY NO. 57

24 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
25 Ralph Lauren Factory Store in Barstow, California, between May 30, 2003, and May 30, 2004.

26 RESPONSE TO SPECIAL INTERROGATORY NO. 57

27 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
28 burdensome and oppressive. Defendants further object to this request on the ground that this request

1 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
2 admissible evidence.

3 Subject to and without waiving these objections, Defendants respond as follows:

4 See information contained in chart for store #25, attached hereto as Exhibit A.

5 SPECIAL INTERROGATORY NO. 58

6 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
7 Ralph Lauren Factory Store in Barstow, California, between May 30, 2004, and May 30, 2005.

8 RESPONSE TO SPECIAL INTERROGATORY NO. 58

9 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
10 burdensome and oppressive. Defendants further object to this request on the ground that this request
11 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
12 admissible evidence.

13 Subject to and without waiving these objections, Defendants respond as follows:

14 See information contained in chart for store #25, attached hereto as Exhibit A.

15 SPECIAL INTERROGATORY NO. 59

16 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
17 Ralph Lauren Factory Store in Barstow, California, between May 30, 2005, and May 30, 2006.

18 RESPONSE TO SPECIAL INTERROGATORY NO. 59

19 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
20 burdensome and oppressive. Defendants further object to this request on the ground that this request
21 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
22 admissible evidence.

23 Subject to and without waiving these objections, Defendants respond as follows:

24 See information contained in chart for store #25, attached hereto as Exhibit A.

25 SPECIAL INTERROGATORY NO. 60

26 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
27 Ralph Lauren Factory Store in Barstow, California, between May 30, 2006, and the present.

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1 RESPONSE TO SPECIAL INTERROGATORY NO. 60

2 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
3 burdensome and oppressive. Defendants further object to this request on the ground that this request
4 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
5 admissible evidence.

6 Subject to and without waiving these objections, Defendants respond as follows:

7 See information contained in chart for store #25, attached hereto as Exhibit A.

8 SPECIAL INTERROGATORY NO. 61

9 State the number Of SALES ASSOCIATES employed for any amount of time in YOUR Polo
10 Ralph Lauren Factory Store in Cabazon, California, between May 30, 2002, and May 30, 2003.

11 RESPONSE TO SPECIAL INTERROGATORY NO. 61

12 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
13 burdensome and oppressive. Defendants further object to this request on the ground that this request
14 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
15 admissible evidence.

16 Subject to and without waiving these objections, Defendants respond as follows:

17 See information contained in chart for store #65, attached hereto as Exhibit A.

18 SPECIAL INTERROGATORY NO. 62

19 State the number of SALES ASSOCIATES employed for. any amount of time in YOUR Polo
20 Ralph Lauren Factory Store in Cabazon, California, between May 30, 2003, and May 30 2004.

21 RESPONSE TO SPECIAL INTERROGATORY NO. 62

22 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
23 burdensome and oppressive. Defendants further object to this request on the ground that this request
24 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
25 admissible evidence.

26 Subject to and without waiving these objections, Defendants respond as follows:

27 See information contained in chart for store #65, attached hereto as Exhibit A.

28 ///

1 SPECIAL INTERROGATORY NO. 63

2 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
3 Ralph Lauren Factory Store in Cabazon, California, between May 30, 2004, and May 30 2005.

4 RESPONSE TO SPECIAL INTERROGATORY NO. 63

5 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
6 burdensome and oppressive. Defendants further object to this request on the ground that this request
7 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
8 admissible evidence.

9 Subject to and without waiving these objections, Defendants respond as follows:

10 See information contained in chart for store #65, attached hereto as Exhibit A.

11 SPECIAL INTERROGATORY NO. 64

12 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
13 Ralph Lauren Factory Store in Cabazon, California, between May 30, 2005, and May 30, 2006.

14 RESPONSE TO SPECIAL INTERROGATORY NO. 64

15 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
16 burdensome and oppressive. Defendants further object to this request on the ground that this request
17 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
18 admissible evidence.

19 Subject to and without waiving these objections, Defendants respond as follows:

20 See information contained in chart for store #65, attached hereto as Exhibit A.

21 SPECIAL INTERROGATORY NO. 65

22 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
23 Ralph Lauren Factory Store in Cabazon, California, between May 30, 2006, and the present.

24 RESPONSE TO SPECIAL INTERROGATORY NO. 65

25 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
26 burdensome and oppressive. Defendants further object to this request on the ground that this request
27 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
28 admissible evidence.

1 Subject to and without waiving these objections, Defendants respond as follows:

2 See information contained in chart for store #65, attached hereto as Exhibit A.

3 SPECIAL INTERROGATORY NO. 66

4 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
5 Ralph Lauren Factory Store in Camarillo, California, between May 30, 2002, and May 30, 2003.

6 RESPONSE TO SPECIAL INTERROGATORY NO. 66

7 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
8 burdensome and oppressive. Defendants further object to this request on the ground that this request
9 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
10 admissible evidence.

11 Subject to and without waiving these objections, Defendants respond as follows:

12 See information contained in chart for store #34, attached hereto as Exhibit A.

13 SPECIAL INTERROGATORY NO. 67

14 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
15 Ralph Lauren Factory Store in Camarillo, California, between May 30, 2003, and May 30, 2004.

16 RESPONSE TO SPECIAL INTERROGATORY NO. 67

17 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
18 burdensome and oppressive. Defendants further object to this request on the ground that this request
19 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
20 admissible evidence.

21 Subject to and without waiving these objections, Defendants respond as follows:

22 See information contained in chart for store #34, attached hereto as Exhibit A.

23 SPECIAL INTERROGATORY NO. 68

24 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
25 Ralph Lauren Factory Store in Camarillo, California, between May 30, 2004, and May 30, 2005.

26 RESPONSE TO SPECIAL INTERROGATORY NO. 68

27 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
28 burdensome and oppressive. Defendants further object to this request on the ground that this request

1 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
2 admissible evidence.

3 Subject to and without waiving these objections, Defendants respond as follows:

4 See information contained in chart for store #34, attached hereto as Exhibit A.

5 SPECIAL INTERROGATORY NO. 69

6 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
7 Ralph Lauren Factory Store in Camarillo, California, between May 30, 2005, and May 30, 2006.

8 RESPONSE TO SPECIAL INTERROGATORY NO. 69

9 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
10 burdensome and oppressive. Defendants further object to this request on the ground that this request
11 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
12 admissible evidence.

13 Subject to and without waiving these objections, Defendants respond as follows:

14 See information contained in chart for store #34, attached hereto as Exhibit A.

15 SPECIAL INTERROGATORY NO. 70

16 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
17 Ralph Lauren Factory Store in Camarillo, California, between May 30, 2006, and the present.

18 RESPONSE TO SPECIAL INTERROGATORY NO. 70

19 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
20 burdensome and oppressive. Defendants further object to this request on the ground that this request
21 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
22 admissible evidence.

23 Subject to and without waiving these objections, Defendants respond as follows:

24 See information contained in chart for store #34, attached hereto as Exhibit A.

25 SPECIAL INTERROGATORY NO. 71

26 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
27 Ralph Lauren Factory Store in Carlsbad, California, between May 30, 2002, and May 30, 2003.

28 ///

1 RESPONSE TO SPECIAL INTERROGATORY NO. 71

2 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
3 burdensome and oppressive. Defendants further object to this request on the ground that this request
4 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
5 admissible evidence.

6 Subject to and without waiving these objections, Defendants respond as follows:

7 See information contained in chart for store #93, attached hereto as Exhibit A.

8 SPECIAL INTERROGATORY NO. 72

9 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
10 Ralph Lauren Factory Store in Carlsbad, California, between May 30, 2003, and May 30, 2004.

11 RESPONSE TO SPECIAL INTERROGATORY NO. 72

12 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
13 burdensome and oppressive. Defendants further object to this request on the ground that this request
14 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
15 admissible evidence.

16 Subject to and without waiving these objections, Defendants respond as follows:

17 See information contained in chart for store #93, attached hereto as Exhibit A.

18 SPECIAL INTERROGATORY NO. 73

19 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
20 Ralph Lauren Factory Store in Carlsbad, California, between May 30, 2004, and May 30, 2005.

21 RESPONSE TO SPECIAL INTERROGATORY NO. 73

22 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
23 burdensome and oppressive. Defendants further object to this request on the ground that this request
24 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
25 admissible evidence.

26 Subject to and without waiving these objections, Defendants respond as follows:

27 See information contained in chart for store #93, attached hereto as Exhibit A.

28 ///

1 SPECIAL INTERROGATORY NO. 74

2 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
3 Ralph Lauren Factory Store in Carlsbad, California, between May 30, 2005, and May 30, 2006.

4 RESPONSE TO SPECIAL INTERROGATORY NO. 74

5 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
6 burdensome and oppressive. Defendants further object to this request on the ground that this request
7 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
8 admissible evidence.

9 Subject to and without waiving these objections, Defendants respond as follows:

10 See information contained in chart for store #93, attached hereto as Exhibit A.

11 SPECIAL INTERROGATORY NO. 75

12 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
13 Ralph Lauren Factory Store in Carlsbad, California, between May 30, 2006, and the present.

14 RESPONSE TO SPECIAL INTERROGATORY NO. 75

15 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
16 burdensome and oppressive. Defendants further object to this request on the ground that this request
17 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
18 admissible evidence.

19 Subject to and without waiving these objections, Defendants respond as follows:

20 See information contained in chart for store #93, attached hereto as Exhibit A.

21 SPECIAL INTERROGATORY NO. 76

22 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
23 Ralph Lauren Factory Store in Gilroy, California, between May 30, 2002, and May 30, 2003.

24 RESPONSE TO SPECIAL INTERROGATORY NO. 76

25 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
26 burdensome and oppressive. Defendants further object to this request on the ground that this request
27 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
28 admissible evidence.

1 Subject to and without waiving these objections, Defendants respond as follows:

2 See information contained in chart for store #102, attached hereto as Exhibit A.

3 SPECIAL INTERROGATORY NO. 77

4 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
5 Ralph Lauren Factory Store in Gilroy, California, between May 30, 2003, and May 30, 2004.

6 RESPONSE TO SPECIAL INTERROGATORY NO. 77

7 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
8 burdensome and oppressive. Defendants further object to this request on the ground that this request
9 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
10 admissible evidence.

11 Subject to and without waiving these objections, Defendants respond as follows:

12 See information contained in chart for store #102, attached hereto as Exhibit A.

13 SPECIAL INTERROGATORY NO. 78

14 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
15 Ralph Lauren Factory Store in Gilroy, California, between May, 30, 2004, and May 30, 2005.

16 RESPONSE TO SPECIAL INTERROGATORY NO. 78

17 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
18 burdensome and oppressive. Defendants further object to this request on the ground that this request
19 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
20 admissible evidence.

21 Subject to and without waiving these objections, Defendants respond as follows:

22 See information contained in chart for store #102, attached hereto as Exhibit A.

23 SPECIAL INTERROGATORY NO. 79

24 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
25 Ralph Lauren Factory Store in Gilroy, California, between May 30, 2005, and May 30, 2006.

26 RESPONSE TO SPECIAL INTERROGATORY NO. 79

27 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
28 burdensome and oppressive. Defendants further object to this request on the ground that this request

1 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
2 admissible evidence.

3 Subject to and without waiving these objections, Defendants respond as follows:

4 See information contained in chart for store #102, attached hereto as Exhibit A.

5 SPECIAL INTERROGATORY NO. 80

6 State the number .of SALES ASSOCIATES employed for any amount of time in YOUR
7 Polo Ralph Lauren Factory Store in Gilroy, California, between May 30, 2006, and the present.

8 RESPONSE TO SPECIAL INTERROGATORY NO. 80

9 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
10 burdensome and oppressive. Defendants further object to this request on the ground that this request
11 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
12 admissible evidence.

13 Subject to and without waiving these objections, Defendants respond as follows:

14 See information contained in chart for store #102, attached hereto as Exhibit A.

15 SPECIAL INTERROGATORY NO. 81

16 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
17 Ralph Lauren Factory Stare in Mammoth Lakes, California, between May 30, 2002, and May 30,
18 2003.

19 RESPONSE TO SPECIAL INTERROGATORY NO. 81

20 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
21 burdensome and oppressive. Defendants further object to this request on the ground that this request
22 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
23 admissible evidence.

24 Subject to and without waiving these objections, Defendants respond as follows:

25 See information contained in chart for store #30, attached hereto as Exhibit A.

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1 SPECIAL INTERROGATORY NO. 82

2 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
3 Ralph Lauren Factory Store in Mammoth Lakes, California, between May 30, 2003, and May 30,
4 2004.

5 RESPONSE TO SPECIAL INTERROGATORY NO. 82

6 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
7 burdensome and oppressive. Defendants further object to this request on the ground that this request
8 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
9 admissible evidence.

10 Subject to and without waiving these objections, Defendants respond as follows:

11 See information contained in chart for store #30, attached hereto as Exhibit A.

12 SPECIAL INTERROGATORY NO. 83

13 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
14 Ralph Lauren Factory Store in Mammoth Lakes, California, between May 30, 2004, and May 30,
15 2005.

16 RESPONSE TO SPECIAL INTERROGATORY NO. 83

17 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
18 burdensome and oppressive. Defendants further object to this request on the ground that this request
19 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
20 admissible evidence.

21 Subject to and without waiving these objections, Defendants respond as follows:

22 See information contained in chart for store #30, attached hereto as Exhibit A.

23 SPECIAL INTERROGATORY NO. 84

24 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
25 Ralph Lauren Factory Store in Mammoth Lakes, California, between May 30, 2005, and May 30, 2006.

26 RESPONSE TO SPECIAL INTERROGATORY NO. 84

27 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
28 burdensome and oppressive. Defendants further object to this request on the ground that this request

1 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
2 admissible evidence.

3 Subject to and without waiving these objections, Defendants respond as follows:

4 See information contained in chart for store #30, attached hereto as Exhibit A.

5 SPECIAL INTERROGATORY NO. 85

6 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
7 Ralph Lauren Factory Store in Mammoth Lakes, California, between May 30, 2006, and the present.

8 RESPONSE TO SPECIAL INTERROGATORY NO. 85

9 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
10 burdensome and oppressive. Defendants further object to this request on the ground that this request
11 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
12 admissible evidence.

13 Subject to and without waiving these objections, Defendants respond as follows:

14 See information contained in chart for store #30, attached hereto as Exhibit A.

15 SPECIAL INTERROGATORY NO. 86

16 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
17 Ralph Lauren Factory Store in Ontario, California, between May 30, 2002, and May 30, 2003.

18 RESPONSE TO SPECIAL INTERROGATORY NO. 86

19 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
20 burdensome, oppressive and calls for speculation. Defendants further object on the ground that the
21 interrogatory is premature in that it seeks information regarding a store that was not yet opened.
22 Defendants finally object to this request on the ground that this request seeks information that is not
23 relevant and is not reasonably calculated to lead to the discovery of admissible evidence.

24 Subject to and without waiving these objections, Defendants respond as follows:

25 There were no sales associates employed at this time because the store was not yet opened.

26 SPECIAL INTERROGATORY NO. 87

27 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
28 Ralph Lauren Factory Store in Ontario, California, between May 30, 2003, and May 30, 2004.

1 RESPONSE TO SPECIAL INTERROGATORY NO. 87

2 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
3 burdensome, oppressive and calls for speculation. Defendants further object on the ground that the
4 interrogatory is premature in that it seeks information regarding a store that was not yet opened.
5 Defendants finally object to this request on the ground that this request seeks information that is not
6 relevant and is not reasonably calculated to lead to the discovery of admissible evidence.

7 Subject to and without waiving these objections, Defendants respond as follows:

8 There were no sales associates employed at this time because the store was not yet opened.

9 SPECIAL INTERROGATORY NO. 88

10 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
11 Ralph Lauren Factory Store in Ontario, California, between May 30, 2004, and May 30, 2005.

12 RESPONSE TO SPECIAL INTERROGATORY NO. 88

13 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
14 burdensome, oppressive and calls for speculation. Defendants further object on the ground that the
15 interrogatory is premature in that it seeks information regarding a store that was not yet opened.
16 Defendants finally object to this request on the ground that this request seeks information that is not
17 relevant and is not reasonably calculated to lead to the discovery of admissible evidence.

18 Subject to and without waiving these objections, Defendants respond as follows:

19 There were no sales associates employed at this time because the store was not yet opened.

20 SPECIAL INTERROGATORY NO. 89

21 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
22 Ralph Lauren Factory Store in Ontario, California, between May 30, 2005, and May 30, 2006.

23 RESPONSE TO SPECIAL INTERROGATORY NO. 89

24 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
25 burdensome, oppressive and calls for speculation. Defendants further object on the ground that the
26 interrogatory is premature in that it seeks information regarding a store that was not yet opened
27 during part of the time period of the request. Defendants finally object to this request on the ground

1 that this request seeks information that is not relevant and is not reasonably calculated to lead to the
2 discovery of admissible evidence.

3 Subject to and without waiving these objections, Defendants respond as follows:

4 See information contained in chart for store #156 attached hereto as Exhibit A.

5 SPECIAL INTERROGATORY NO. 90

6 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
7 Ralph Lauren Factory Store in Ontario, California, between May-30, 2006; and the present.

8 RESPONSE TO SPECIAL INTERROGATORY NO. 90

9 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
10 burdensome and oppressive. Defendants further object to this request on the ground that this request
11 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
12 admissible evidence.

13 Subject to and without waiving these objections, Defendants respond as follows:

14 See information contained in chart for store #156, attached hereto as Exhibit A.

15 SPECIAL INTERROGATORY NO. 91

16 State the number of SALES ASSOCIATES employed for any amount of time in YOUR
17 Polo Ralph Lauren Factory Store in Pismo Beach, California, between May 30, 2002, and May 30,
18 2003

19 RESPONSE TO SPECIAL INTERROGATORY NO. 91

20 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
21 burdensome, oppressive and calls for speculation. Defendants further object on the ground that the
22 interrogatory is premature in that it seeks information regarding a store that was not yet opened.
23 Defendants finally object to this request on the ground that this request seeks information that is not
24 relevant and is not reasonably calculated to lead to the discovery of admissible evidence.

25 Subject to and without waiving these objections, Defendants respond as follows:

26 There were no sales associates employed at this time because the store was not yet opened.

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1 SPECIAL INTERROGATORY NO. 92

2 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
3 Ralph Lauren Factory Store in Pismo Beach, California, between May 30, 2003, and May 30, 2004.

4 RESPONSE TO SPECIAL INTERROGATORY NO. 92

5 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
6 burdensome, oppressive and calls for speculation. Defendants further object on the ground that the
7 interrogatory is premature in that it seeks information regarding a store that was not yet opened.
8 Defendants finally object to this request on the ground that this request seeks information that is not
9 relevant and is not reasonably calculated to lead to the discovery of admissible evidence.

10 Subject to and without waiving these objections, Defendants respond as follows:

11 There were no sales associates employed at this time because the store was not yet opened.

12 SPECIAL INTERROGATORY NO. 93

13 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
14 Ralph Lauren Factory Store in Pismo Beach, California, between May 30, 2004, and May 30, 2005.

15 RESPONSE TO SPECIAL INTERROGATORY NO. 93

16 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
17 burdensome, oppressive and calls for speculation. Defendants further object on the ground that the
18 interrogatory is premature in that it seeks information regarding a store that was not yet opened.
19 Defendants finally object to this request on the ground that this request seeks information that is not
20 relevant and is not reasonably calculated to lead to the discovery of admissible evidence.

21 Subject to and without waiving these objections, Defendants respond as follows:

22 There were no sales associates employed at this time because the store was not yet opened.

23 SPECIAL INTERROGATORY NO. 94

24 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
25 Ralph Lauren Factory Store in Pismo Beach, California, between May 30, 2005, and May 30, 2006.

26 RESPONSE TO SPECIAL INTERROGATORY NO. 94

27 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
28 burdensome, oppressive and calls for speculation. Defendants further object on the ground that the

1 interrogatory is premature in that it seeks information regarding a store that was not yet opened
2 during part of the time period of the request. Defendants finally object to this request on the ground
3 that this request seeks information that is not relevant and is not reasonably calculated to lead to the
4 discovery of admissible evidence.

5 Subject to and without waiving these objections, Defendants respond as follows:

6 See information contained in chart for store #159 attached hereto as Exhibit A.

7 SPECIAL INTERROGATORY NO. 95

8 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
9 Ralph Lauren Factory Store in Pismo Beach, California, between May 30, 2006, and the present.

10 RESPONSE TO SPECIAL INTERROGATORY NO. 95

11 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
12 burdensome and oppressive. Defendants further object to this request on the ground that this request
13 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
14 admissible evidence.

15 Subject to and without waiving these objections, Defendants respond as follows:

16 See information contained in chart for store #159, attached hereto as Exhibit A.

17 SPECIAL INTERROGATORY NO. 96

18 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
19 Ralph Lauren Factory Store in San Diego, California, between May 30, 2002, and May 30, 2003.

20 RESPONSE TO SPECIAL INTERROGATORY NO. 96

21 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
22 burdensome and oppressive. Defendants further object to this request on the ground that this request
23 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
24 admissible evidence.

25 Subject to and without waiving these objections, Defendants respond as follows:

26 See information contained in chart for store #143, attached hereto as Exhibit A.

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1 SPECIAL INTERROGATORY NO. 97

2 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
3 Ralph Lauren Factory Store in San Diego, California, between May 30, 2003, and May 30, 2004.

4 RESPONSE TO SPECIAL INTERROGATORY NO. 97

5 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
6 burdensome and oppressive. Defendants further object to this request on the ground that this request
7 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
8 admissible evidence.

9 Subject to and without waiving these objections, Defendants respond as follows:

10 See information contained in chart for store #143, attached hereto as Exhibit A.

11 SPECIAL INTERROGATORY NO. 98

12 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
13 Ralph Lauren Factory Store in San Diego, California, between May 30, 2004, and May 30, 2005.

14 RESPONSE TO SPECIAL INTERROGATORY NO. 98

15 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
16 burdensome and oppressive. Defendants further object to this request on the ground that this request
17 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
18 admissible evidence.

19 Subject to and without waiving these objections, Defendants respond as follows:

20 See information contained in chart for store #143, attached hereto as Exhibit A.

21 SPECIAL INTERROGATORY NO. 99

22 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
23 Ralph Lauren Factory Store in San Diego, California, between May 30, 2005, and May 30, 2006.

24 RESPONSE TO SPECIAL INTERROGATORY NO. 99

25 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
26 burdensome and oppressive. Defendants further object to this request on the ground that this request
27 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
28 admissible evidence.

1 Subject to and without waiving these objections, Defendants respond as follows:

2 See information contained in chart for store #143, attached hereto as Exhibit A.

3 SPECIAL INTERROGATORY NO. 100

4 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
5 Ralph Lauren Factory Store in San Diego, California, between May 30, 2006, and the present.

6 RESPONSE TO SPECIAL INTERROGATORY NO. 100

7 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
8 burdensome and oppressive. Defendants further object to this request on the ground that this request
9 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
10 admissible evidence.

11 Subject to and without waiving these objections, Defendants respond as follows:

12 See information contained in chart for store #143, attached hereto as Exhibit A.

13 SPECIAL INTERROGATORY NO. 101

14 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
15 Ralph Lauren Factory Store in Tulare, California, between May 30, 2002, and May 30, 2003.

16 RESPONSE TO SPECIAL INTERROGATORY NO. 101

17 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
18 burdensome and oppressive. Defendants further object to this request on the ground that this request
19 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
20 admissible evidence.

21 Subject to and without waiving these objections, Defendants respond as follows:

22 See information contained in chart for store #64, attached hereto as Exhibit A.

23 SPECIAL INTERROGATORY NO. 102

24 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
25 Ralph Lauren Factory Store in Tulare, California, between May 30, 2003, and May 30, 2004.

26 RESPONSE TO SPECIAL INTERROGATORY NO. 102

27 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
28 burdensome and oppressive. Defendants further object to this request on the ground that this request

1 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
2 admissible evidence.

3 Subject to and without waiving these objections, Defendants respond as follows:

4 See information contained in chart for store #64, attached hereto as Exhibit A.

5 SPECIAL INTERROGATORY NO. 103

6 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
7 Ralph Lauren Factory Store in Tulare, California, between May 30, 2004, and May 30, 2005.

8 RESPONSE TO SPECIAL INTERROGATORY NO. 103

9 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
10 burdensome and oppressive. Defendants further object to this request on the ground that this request
11 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
12 admissible evidence.

13 Subject to and without waiving these objections, Defendants respond as follows:

14 See information contained in chart for store #64, attached hereto as Exhibit A.

15 SPECIAL INTERROGATORY NO. 104

16 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
17 Ralph Lauren Factory Store in Tulare, California, between May 30, 2005, and May 30, 2006.

18 RESPONSE TO SPECIAL INTERROGATORY NO. 104

19 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
20 burdensome and oppressive. Defendants further object to this request on the ground that this request
21 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
22 admissible evidence.

23 Subject to and without waiving these objections, Defendants respond as follows:

24 See information contained in chart for store #64, attached hereto as Exhibit A.

25 SPECIAL INTERROGATORY NO. 105

26 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
27 Ralph Lauren Factory Store in Tulare, California, between May 30, 2006, and the present.

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1 RESPONSE TO SPECIAL INTERROGATORY NO. 105

2 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
3 burdensome and oppressive. Defendants further object to this request on the ground that this request
4 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
5 admissible evidence.

6 Subject to and without waiving these objections, Defendants respond as follows:

7 See information contained in chart for store #64, attached hereto as Exhibit A.

8 SPECIAL INTERROGATORY NO. 106

9 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
10 Ralph Lauren Factory Store in Vacaville, California, between May 30, 2002, and May 30, 2003.

11 RESPONSE TO SPECIAL INTERROGATORY NO. 106

12 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
13 burdensome and oppressive. Defendants further object to this request on the ground that this request
14 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
15 admissible evidence.

16 Subject to and without waiving these objections, Defendants respond as follows:

17 See information contained in chart for store #141, attached hereto as Exhibit A.

18 SPECIAL INTERROGATORY NO. 107

19 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
20 Ralph Lauren Factory Store in Vacaville, California, between May 30, 2003 and May 30, 2004.

21 RESPONSE TO SPECIAL INTERROGATORY NO. 107

22 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
23 burdensome and oppressive. Defendants further object to this request on the ground that this request
24 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
25 admissible evidence.

26 Subject to and without waiving these objections, Defendants respond as follows:

27 See information contained in chart for store #141, attached hereto as Exhibit A.

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1 SPECIAL INTERROGATORY NO. 108

2 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
3 Ralph Lauren Factory Store in Vacaville, California, between May 30, 2004, and May 30, 2005.

4 RESPONSE TO SPECIAL INTERROGATORY NO. 108

5 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
6 burdensome and oppressive. Defendants further object to this request on the ground that this request
7 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
8 admissible evidence.

9 Subject to and without waiving these objections, Defendants respond as follows:

10 See information contained in chart for store #141, attached hereto as Exhibit A.

11 SPECIAL INTERROGATORY NO. 109

12 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
13 Ralph Lauren Factory Store in Vacaville, California, between May 30, 2005, and May 30, 2006.

14 RESPONSE TO SPECIAL INTERROGATORY NO. 109

15 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
16 burdensome and oppressive. Defendants further object to this request on the ground that this request
17 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
18 admissible evidence.

19 Subject to and without waiving these objections, Defendants respond as follows:

20 See information contained in chart for store #141, attached hereto as Exhibit A.

21 SPECIAL INTERROGATORY NO. 110

22 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
23 Ralph Lauren Factory Store in Vacaville, California, between May 30, 2006, and the present.

24 RESPONSE TO SPECIAL INTERROGATORY NO. 110

25 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
26 burdensome and oppressive. Defendants further object to this request on the ground that this request
27 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
28 admissible evidence.

1 Subject to and without waiving these objections, Defendants respond as follows:

2 See information contained in chart for store #141, attached hereto as Exhibit A.

3 SPECIAL INTERROGATORY NO. 111

4 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
5 Jeans Co. Factory Store in Cabazon, California, between May 30, 2002, and May 30, 2003.

6 RESPONSE TO SPECIAL INTERROGATORY NO. 111

7 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
8 burdensome and oppressive. Defendants further object to this request on the ground that this request
9 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
10 admissible evidence.

11 Subject to and without waiving these objections, Defendants respond as follows:

12 See information contained in chart for store #336, attached hereto as Exhibit A.

13 SPECIAL INTERROGATORY NO. 112

14 State the number of SALES ASSOCIATES employed for any amount of in YOUR Polo Jeans
15 Co. Factory Store in Cabazon, California, between May 30, 2003, and May 30, 2004.

16 RESPONSE TO SPECIAL INTERROGATORY NO. 112

17 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
18 burdensome and oppressive. Defendants further object to this request on the ground that this request
19 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
20 admissible evidence.

21 Subject to and without waiving these objections, Defendants respond as follows:

22 See information contained in chart for store #336, attached hereto as Exhibit A.

23 SPECIAL INTERROGATORY NO. 113

24 State the number of SALES ASSOCIATES employed for any amount of in YOUR Polo Jeans
25 Co. Factory Store in Cabazon, California, between May 30, 2004, and May 30, 2005.

26 RESPONSE TO SPECIAL INTERROGATORY NO. 113

27 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
28 burdensome and oppressive. Defendants further object to this request on the ground that this request

1 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
2 admissible evidence.

3 Subject to and without waiving these objections, Defendants respond as follows:

4 See information contained in chart for store #336, attached hereto as Exhibit A.

5 SPECIAL INTERROGATORY NO. 114

6 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
7 Jeans Co. Factory Store in Cabazon, California, between May 30, 2005, and May 30, 2006.

8 RESPONSE TO SPECIAL INTERROGATORY NO. 114

9 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
10 burdensome and oppressive. Defendants further object to this request on the ground that this request
11 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
12 admissible evidence.

13 Subject to and without waiving these objections, Defendants respond as follows:

14 See information contained in chart for store #336, attached hereto as Exhibit A.

15 SPECIAL INTERROGATORY NO. 115

16 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
17 Jeans Co. Factory Store in Cabazon, California, between May 30, 2006, and the present.

18 RESPONSE TO SPECIAL INTERROGATORY NO. 115

19 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
20 burdensome and oppressive. Defendants further object to this request on the ground that this request
21 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
22 admissible evidence. Finally, Defendants object on the ground that the interrogatory seeks
23 information for a time period after the store ceased its business operations.

24 Subject to and without waiving these objections, Defendants respond as follows:

25 See information contained in chart for store #336, attached hereto as Exhibit A.

26 SPECIAL INTERROGATORY NO. 116

27 State the number of SALES ASSOCIATES employed for any amount of in. YOUR Polo
28 Jeans Co. Factory Store in Camarillo, California, between May 30, 2002, and May 30, 2003.

1 RESPONSE TO SPECIAL INTERROGATORY NO. 116

2 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
3 burdensome and oppressive. Defendants further object to this request on the ground that this request
4 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
5 admissible evidence.

6 Subject to and without waiving these objections, Defendants respond as follows:

7 See information contained in chart for store #340.

8 SPECIAL INTERROGATORY NO. 117

9 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
10 Jeans Co. Factory Store in Camarillo, California, between May 30, 2003, and May 30, 2004.

11 RESPONSE TO SPECIAL INTERROGATORY NO. 117

12 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
13 burdensome and oppressive. Defendants further object to this request on the ground that this request
14 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
15 admissible evidence.

16 Subject to and without waiving these objections, Defendants respond as follows:

17 See information contained in chart for store #340.

18 SPECIAL INTERROGATORY NO. 118

19 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
20 Jeans Co. Factory Store in Camarillo, California, between May 30, 2004, and May 30, 2005.

21 RESPONSE TO SPECIAL INTERROGATORY NO. 118

22 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
23 burdensome and oppressive. Defendants further object to this request on the ground that this request
24 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
25 admissible evidence.

26 Subject to and without waiving these objections, Defendants respond as follows:

27 See information contained in chart for store #340.

28 ///

1 SPECIAL INTERROGATORY NO. 119

2 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
3 Jeans Co. Factory Store in Camarillo, California, between May 30, 2005, and May 30, 2006.

4 RESPONSE TO SPECIAL INTERROGATORY NO. 119

5 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
6 burdensome and oppressive. Defendants further object to this request on the ground that this request
7 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
8 admissible evidence.

9 Subject to and without waiving these objections, Defendants respond as follows:

10 See information contained in chart for store #340.

11 SPECIAL INTERROGATORY NO. 120

12 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
13 Jeans Co. Factory Store in Camarillo, California, between May 30, 2006, and the present.

14 RESPONSE TO SPECIAL INTERROGATORY NO. 120

15 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
16 burdensome and oppressive. Defendants further object to this request on the ground that this request
17 seeks information that is not relevant and is not reasonably calculated to lead to the discovery of
18 admissible evidence. Finally, Defendants object on the ground that the interrogatory seeks
19 information for a time period after the store ceased its business operations.

20 Subject to and without waiving these objections, Defendants respond as follows:

21 See information contained in chart for store #340.

22 SPECIAL INTERROGATORY NO. 121

23 State the number of SALES ASSOCIATES employed for any amount of time in YOUR Polo
24 Jeans Co. Factory Store in Gilroy, California, between May 30, 2002, and May 30, 2003.

25 RESPONSE TO SPECIAL INTERROGATORY NO. 121

26 Defendants object to this interrogatory on the grounds that it is overly broad, unduly
27 burdensome and oppressive. Defendants further object to this request on the ground that this request